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Attorney for Defendant
RONDELL CRAMER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

RONDELL CRAMER
Defendant.

) Case No. 2:22-cr-00249-TLN-1

) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE

) Date: April 20, 2023

) Time: 9:30 a.m.

) Judge: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Assistant United States Attorney Adrian Kinsella, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Hannah R. Labaree, attorney for RONDELL CRAMER, that the status conference, currently scheduled for April 20, 2023, be continued to June 8, 2023 at 9:30 a.m.

Defense counsel requires time to review the discovery in the case, to conduct independent investigation and to do legal research related to sentencing exposure. Further, she requires additional time to confer with her client related to the discovery, investigation, and Sentencing Guidelines.

The parties therefore request a T4 exclusion of time for defense investigation until June 8, 2023.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be

1 excluded from this order's date through and including June 8, 2023; pursuant to 18 U.S.C. §3161
2 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4 based
3 upon continuity of counsel and defense preparation.

4 Dated: April 13, 2023

5 HEATHER E. WILLIAMS
6 Federal Defender

7 /s/ Hannah R. Labaree
8 HANNAH R. LABAREE
9 Assistant Federal Defender
Attorney for Defendant
RONDELL CRAMER

10 Dated: April 13, 2023

11 PHILLIP A. TALBERT
12 United States Attorney

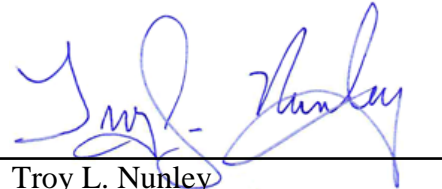
13 /s/ Adrian Kinsella
14 ADRIAN KINSELLA
15 Assistant U.S. Attorney
16 Attorney for Plaintiff
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ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including June 8, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the April 20, 2023 status conference shall be continued until June 8, 2023, at 9:30 a.m.

Dated: April 13, 2023



Troy L. Nunley
United States District Judge